

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, *et al.*

Plaintiffs,

v.

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS, *et al.*

Defendants.

Case Number: 1:23-cv-10301-AS

**DEFENDANT VINCENT FRAZER’S JOINDER IN THE GOVERNMENT’S MOTION
TO DISMISS THE PLAINTIFFS’ SECOND AMENDED COMPLAINT**

COME NOW, Defendant VINCENT FRAZER, Pro Se, and respectfully requests that this Court grant leave for Defendant Frazer to join in the arguments set forth in the Government of the United States Virgin Islands’ Motion to Dismiss the Plaintiffs’ Second Amended Complaint. In support of this Motion, Defendant states as follows:

1. Plaintiffs filed their initial Complaint on November 22, 2023 and filed an Amended Complaint on December 13, 2023. A Second Amended Complaint has now been filed.
2. This Court set a deadline of July 3, 2024 for all defendants to file a response to the Plaintiff’s Complaint. (Dkt. 109 & May 29, 2024 minute order).
3. Defendant has reviewed the arguments set forth by Defendant Government of the United States Virgin Islands in its Motion to Dismiss and believes that most, if not all, of the arguments are equally applicable to the claims against Defendant. Specifically, for the reasons set forth in that brief: (a) the Court lacks Personal Jurisdiction over Defendant; (b) venue is improper in New York; and (c) the Complaint fails to state any claim against Defendant as a matter of law.

WHEREFORE, Defendant Frazer respectfully joins in the arguments set forth by the Government of the U.S. Virgin Islands in opposition to the Second Amended Complaint.

Dated: July 3, 2024

Respectfully Submitted,

/s/ Vincent Frazer

VINCENT FRAZER, *pro se*

Defendant

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